

# EXHIBIT A

Mr. Baldoni they would “focus” on: Reddit, TikTok, and Instagram.

#### **H. The Wayfarer Parties Engage in Social Manipulation, with the Assistance of Mr. Wallace.**

224. On August 7, 2024, after discussing the “social combat plan” with Ms. Nathan, Ms. Abel corresponded with other TAG personnel regarding what she referred to as **“social manipulation.”** Specifically, Ms. Abel inquired about the cost of “social media mitigation and proactive fan posting to counter the narrative” surrounding Mr. Baldoni and whether what she had “discussed with [Ms. Nathan] earlier regarding social manipulation (from the separate team based in Hawaii...)” was included in that fee. On information and belief, the referenced “team based in Hawaii” worked with Mr. Wallace and/or at his direction.

225. The same day, TAG indicated their intent to leverage “social” to “quiet/kill” media coverage regarding public suspicions relating to Mr. Baldoni’s disconnect from the Film’s cast.

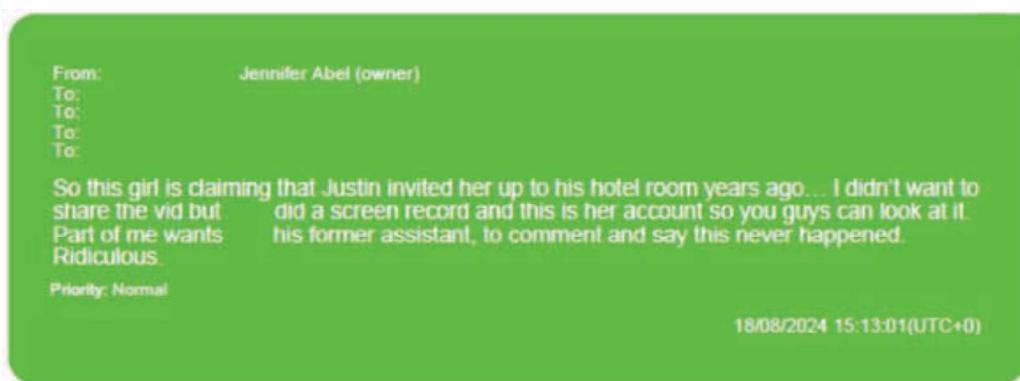
<b>Timestamp:</b> 07/08/2024 19:06:38(UTC+0)	<b>Subject:</b> Re: Social / Digital Mitigation / Remediation <b>Body:</b> <b>Email header:</b> <b>Body file:</b> mes-127.eml	<b>Status:</b> Sent <b>Account:</b> <b>Snippet:</b> Thanks Katie—just for clarity so we understand. Does this cover your initial fee + what we discussed in terms of social media mitigation and proactive fan posting to counter the narrative, or is this in ADDITION to the 15K previously agreed upon fee for TAG and does NOT include what we discussed with MN earlier regarding social manipulation (from the separate team based in Hawaii...). In short, is the total fee incurred by Wayfarer 30K, or is there more required to ensure we are properly protected? <b>Priority:</b> Normal <b>MD5:</b> 450b8a635e28d823c4130b26f805acb9 <b>Source file:</b> EXTRAC <sup>ON</sup> _FFS.zip/root/private/var/mobile/Library/Mail/Envelope_Index : 0x2C7F607 (Table: messages, mailboxes, Size: 137093008 bytes) EXTRAC <sup>ON</sup> _FFS.zip/root/private/var/mobile/Library/Mail/Protected_Index : 0x10324E (Table: addresses, summaries, Size: 79876096 bytes)
<b>From:</b>  Jennifer Abel <b>To:</b>  Jamey Heath <b>To:</b>  Melissa Nathan  <b>Direction:</b> Outgoing		

“amplify[]” positive stories about Mr. Baldoni.

254. The next day, on August 14, 2024, Ms. Abel stated, “I’ll have our digital side boost this [TikTok] in the am.” In the referenced TikTok, an individual who Ms. Lively has never met responds to social media that Mr. Baldoni “made [Ms. Lively] uncomfortably and sad,” calling it “all nonsense.”

255. On August 18, 2024, Mr. Baldoni circulated a TikTok video in which the poster criticized Ms. Lively for not speaking about domestic violence in press interviews. A member of Ms. Nathan’s team responded that she would “let digital know[.]”

256. The same day, Ms. Abel flagged to TAG that “this girl is claiming that [Mr. Baldoni] invited her up to his hotel room years ago.” The TAG team later stated, “[l]et us **chat to Jed** as well on this[.]”



[...]



257. On August 18, 2024, Mr. Baldoni responded on the same thread about

the start that something was deeply wrong. Justin weaponizes therapeutic language, presenting himself as thoughtful and supportive, yet his actions reveal a very different reality. He portrays himself as an ally to women and the vulnerable, but it's all a façade—he manipulates the vernacular of care to mask his true intentions. In reality, none of the proceeds from the show benefited the individuals he profiled. He even had the audacity to depict her hometown, a vibrant and affluent community, as a small, impoverished town. His portrayal was not just inaccurate but insulting. Once the show aired, Justin took his profits and vanished, leaving nothing but a sense of exploitation in his wake. His behavior was not just tacky and gross—it was a betrayal of the very people he claimed to uplift.”

260. In response to the post, Ms. Abel stated, “I’m assuming this is not true in the slightest . . . Either way, ***we’ve flagged to Jed and his team for more serious action on the social side.***” It is worth pausing to consider Ms. Abel’s reaction to this woman’s post—rather than asking Mr. Baldoni whether there is any truth to the allegations, Ms. Abel instead declared that she was flagging the woman’s post to Mr. Wallace “for more serious action on the social side” ***either way***—meaning, Ms. Abel was calling for Mr. Wallace to take action against the woman ***without any regard to whether she was reporting the truth.***

261. During the same period of time, when media sources inquired about HR complaints that were made on the set of the Film, Ms. Nathan, Ms. Abel, and their teams worked to suppress coverage of these HR complaints.

262. Further, on or around August 14, 2024, media outlets directly inquired about HR complaints made on set because they were “being told there were at least three HR complaints filed against Justin Baldoni on the set of ‘It Ends With Us’” and inquired “if the complaints were investigated and what the results were.”

263. By this time, individuals at TAG, Ms. Nathan, and Ms. Abel were aware of the existence of complaints that were made regarding the on-set behavior of Mr. Baldoni and Mr. Heath, and sought clarity as to the specific HR complaints at issue in order to better counter them in the press.

From: [REDACTED]  
To: [REDACTED]  
To: [REDACTED] Melissa Nathan  
To: [REDACTED] Jennifer Abel (owner)  
  
Hey guys re the tmz thing re the HR complaints — our understanding is that 2 were from  
Blake and [REDACTED] re the "sexy" comment. Is the additional one from [REDACTED] re the thing with  
Jamey and her apartment in nyc? Just want to clarify.  
  
Priority: Normal

264. Approximately one minute later, Ms. Abel asserted the “need to position” the claims as “claims that are already out there about the kiss and the weight comment,” referencing earlier public reporting by TMZ on Mr. Baldoni’s “linger[ing]” kiss with Ms. Lively and Mr. Baldoni’s comments regarding Ms. Lively’s weight on set.<sup>39</sup>

265. On or around the same date, Ms. Nathan directly engaged with several media platforms, discussing the issue of the HR complaints made against Mr. Baldoni while on the set of the Film.

266. On August 15, 2024, Ms. Nathan texted Ms. Abel that “DM hounded me re[:] HR complaints.” She stated that “DM” is not running any content about it, continuing “Jen, this went so well I am fucking dying[.] I have to call you later in a bit and tell you how this went. It was genius. So okay, ***we have the four majors standing down on HR complaint [sic].*** I think we are fine on that bit[.]”

267. During the same period of time, Ms. Nathan and her team at TAG planted

<sup>39</sup> TMZ, *Blake Lively, Justin Baldoni She Felt Kissing Scene Lingered Too Long ... Feels He Fat-Shamed Her* (Aug. 14, 2024, 7:55 AM), <https://www.tmz.com/2024/08/14/blake-lively-justin-baldoni-fat-shamed-it-ends-with-us/>.